

# Exhibit 1

Summary: David Langdon (October 26, 2018)

David Langdon has been an employee of the Department of Commerce (“DOC”) since 2011, and currently serves as an employee in the Office of Policy and Strategic Planning at the Department of Commerce. Tr. 31-32. In mid-March 2017, Earl Comstock, Mr. Langdon’s direct supervisor, informed Mr. Langdon that he and Secretary Ross were interested in understanding the process by which Congress is notified of new subjects to be added to the Census or the American Community Survey. Tr. 95-98. Mr. Langdon first learned of Secretary Ross’s interest in adding the citizenship question during the summer of 2017. Tr. 106. In the summer of 2017, Commerce leadership asked him to research whether undocumented immigrants were included in census totals for the apportionment count. Tr. 112, 144-147, 148 – 149, 157-158, Ex. 6, 167-168, 172-177, 182-184, 185-186, Ex. 6.

Despite being the most senior career staffer at the Commerce Department for issues of policy and strategy for the Census, Mr. Langdon did not have input on the citizenship question until at least December 2017, when he reviewed the Census Bureau’s technical analyses of the citizenship question. Tr. 294-295. In addition, he is not aware of any external analyses solicited for evaluating the impact of the citizenship question, beyond what the Census Bureau prepared. Tr. 282 – 283.

The urgency and timeframe of adding the citizenship question did not accommodate any sort of testing of the question or otherwise, a departure from previous practice. Tr. 243.

Until consideration of this decennial census, Mr. Langdon had also never heard of the Department of Justice’s interest in block-level citizenship data for purposes of Voting Rights Act enforcement. Tr. 248-249. The manner in which he found out about this interest – or data need – deviated from the process by which agencies communicate their data needs; which includes a dialogue between agencies at different levels and then a quick turn around on meeting those needs. Tr. 248-249. Discussions about adding the citizenship question were not part of regular census briefings, but occurred at “the senior level.” Tr. 293.